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**From:** Bartlett, Keith [Bartlett.Keith@epa.gov]  
**Sent:** 6/27/2018 4:58:04 PM  
**To:** Ayres, Sara [Ayres.Sara@epa.gov]  
**Subject:** RE: ADP TRACKER - New Workgroup Assignment: SAN 4908 - NESHAP Amendment: General Provisions for Once In Always In Workgroup

I can make one of you the lead; who is up to you both.

As far as uptiering the rule, OC would draft a statement why (with my help if necessary) and I would then submit through the RSC.

Keith

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**From:** Ayres, Sara  
**Sent:** Wednesday, June 27, 2018 12:29 PM  
**To:** Bartlett, Keith <Bartlett.Keith@epa.gov>  
**Subject:** RE: ADP TRACKER - New Workgroup Assignment: SAN 4908 - NESHAP Amendment: General Provisions for Once In Always In Workgroup

What would the process be if we did want to request an uptier? I will check with my management at our weekly tomorrow on if we want to go that route, but they will want to know what's the next step if we want to do it. Also, both Terri Dykes from AED and I are on the workgroup for this rule. Do you know if one of us is officially the lead? Is that assigned for a Tier 3 rule? Thanks.

Sara Ayres  
Air Branch  
USEPA / OECA / OC / MAMPD  
[ayres.sara@epa.gov](mailto:ayres.sara@epa.gov)  
(312) 353-6266

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**From:** Bartlett, Keith  
**Sent:** Wednesday, June 27, 2018 10:09 AM  
**To:** Ayres, Sara <[Ayres.Sara@epa.gov](mailto:Ayres.Sara@epa.gov)>  
**Subject:** RE: ADP TRACKER - New Workgroup Assignment: SAN 4908 - NESHAP Amendment: General Provisions for Once In Always In Workgroup

Sara, this is certainly an odd Tiering. They used the original SAN from 2007 when they proposed something else...

Please see this Rule Summary Document from ADP Tracker.

Please let me know if you would like to raise the possibility of UpTiering the rule.

Thanks –

Keith

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**From:** Ayres, Sara  
**Sent:** Wednesday, June 27, 2018 10:03 AM  
**To:** Bartlett, Keith <[Bartlett.Keith@epa.gov](mailto:Bartlett.Keith@epa.gov)>

**Subject:** FW: ADP TRACKER - New Workgroup Assignment: SAN 4908 - NESHAP Amendment: General Provisions for Once In Always In Workgroup

Keith,

Could you check what tier this rule is? We're working on the draft preamble, but there have been no discussions about EG or OS. It seems like a pretty major change (getting rid of the Once-In-Always-In policy) to be a Tier 3, but I just wanted to check before I raised the issue with my management. Thanks.

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**From:** Janet Eck [<mailto:Eck.Janet@epamail.epa.gov>]  
**Sent:** Tuesday, February 13, 2018 1:24 PM  
**To:** Ayres, Sara <[Ayres.Sara@epa.gov](mailto:Ayres.Sara@epa.gov)>  
**Cc:** Torres, Elineth <[Torres.Elineth@epa.gov](mailto:Torres.Elineth@epa.gov)>; Farrar, Wanda <[farrar.wanda@epa.gov](mailto:farrar.wanda@epa.gov)>  
**Subject:** ADP TRACKER - New Workgroup Assignment: SAN 4908 - NESHAP Amendment: General Provisions for Once In Always In Workgroup

You have been assigned to an ADP Workgroup: SAN 4908 - NESHAP Amendment: General Provisions for Once In Always In Workgroup. Please follow the doclink to view the Workgroup document. 